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*Attorneys for Defendant*  
*PIONEER NATURAL RESOURCES COMPANY*

**IN THE UNITED STATES DISTRICT COURT**  
**FOR THE DISTRICT OF NEVADA**

ROSENBAUM, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00103-GMN-MDC

**NOTICE RE DEFENDANT PIONEER  
NATURAL RESOURCES COMPANY'S  
CERTIFICATE OF INTERESTED  
PARTIES**

*[Caption Continues on Following Page]*

ANDREW CAPLEN INSTALLATIONS,  
LLC, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00150-GMN-MDC

THESE PAWS WERE MADE FOR  
WALKIN' LLC, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00164-GMN-MDC

BRIAN COURTMANCHE, *et al.*,

Plaintiffs,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00198-GMN-MDC

JOHN MELLOR, *et al.*,

Plaintiff,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-CV-00253-GMN-MDC

*[Caption Continues on Following Page]*

LAURIE OLSEN SANTILLO, *et al.*,

Plaintiff,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00279-GMN-MDC

RICHARD BEAUMONT, *et al.*,

Plaintiff,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00298-GMN-MDC

BARBARA AND PHILLIP MACDOWELL,  
*et al.*,

Plaintiff,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00325-GMN-MDC

WESTERN CAB COMPANY *et al.*,

Plaintiff,

v.

PERMIAN RESOURCES CORP., *et al.*,

Defendants.

CASE NO. 2:24-cv-00401-GMN-MDC

1 Defendant Pioneer Natural Resources Company (“Pioneer”) submits this Notice in  
 2 response to the Court’s comments during the March 4, 2024 status conference regarding Pioneer’s  
 3 Certificate of Interested Parties. Having further considered the Federal Rules and this Court’s  
 4 Local Rules, Pioneer believes it does not need to supplement its Certificate at this time to add  
 5 Exxon Mobil Corporation (“Exxon”).

6 In October 2023, Pioneer entered into an Agreement and Plan of Merger with Exxon.  
 7 However, as Pioneer’s most recent Form 10K acknowledges, completion of the merger is “subject  
 8 to certain conditions”—including regulatory approval—and “[t]here can be no assurance that the  
 9 conditions to the closing of the Merger will be satisfied, waived or fulfilled in a timely fashion or  
 10 that the Merger will be completed.” 2024 Form 10-K at 33.<sup>1</sup>

11 Federal Rule of Civil Procedure 7.1 requires Pioneer to disclose corporations “owning 10%  
 12 or more of its stock,” and Nevada Local Rule 7.1-1 requires disclosure of entities “that have a  
 13 direct, pecuniary interest in the outcome of the case.” These rules—both of which are phrased in  
 14 the present tense—do not require identification of Exxon as an interested party *now*, before the  
 15 merger is complete. Exxon does not currently own 10% or more of Pioneer’s stock. Nor does  
 16 Exxon currently have a “*direct*, pecuniary interest” in the outcome of the case. Any interest that  
 17 Exxon holds today is at best an *indirect* interest. And while Exxon would have an interest if the  
 18 merger closes, that is a *potential future* interest. Compare *Righthaven v. Democratic*  
 19 *Underground, LLC*, 791 F. Supp. 2d 968, 978–79 (D. Nev. 2011) (party with a contractual right to  
 20 50% of litigation proceeds had a direct, pecuniary interest under Local Rule 7.1-1), with *Genworth*  
 21 *Life & Annuity Ins. Co. v. Hafter*, 2019 WL 6307607, at \*4 (D. Nev. Nov. 25, 2019) (party’s  
 22 interest was “indirect”—and thus it was neither “necessary nor appropriate . . . to recognize her as  
 23 an interested party” under Local Rule 7.1-1—where the interest was contingent on claims that had  
 24 not yet been alleged). Accordingly, Pioneer respectfully submits that, at this time, Exxon does not  
 25 need to be disclosed in Pioneer’s Certificate of Interested Parties. Pioneer intends to promptly  
 26 supplement its Certificate of Interested Parties to add Exxon when and if the merger is completed.

27  
 28 <sup>1</sup> Available at: <https://d18rn0p25nwr6d.cloudfront.net/CIK-0001038357/6ed66c12-d0a9-4f2e-952f-57f3b8e3718b.pdf>.

Pioneer would be happy to discuss this issue with the Court if it has further questions.

DATED: March 11, 2024

Respectfully submitted,

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By: /s/ Samuel G. Liversidge  
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